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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 In re JUNIPER NETWORKS, INC.
17 SECURITIES LITIGATION

) CASE NO.: C06-04327-JW (PVT)
)
) STIPULATION AND ~~PROPOSED~~
) ORDER RE JUNIPER NETWORKS,
) INC.'S FIFTH SET OF
) INTERROGATORIES (NOS. 16-32)

19 _____
20 This Document Relates To:

21 All Actions
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) BEFORE: Hon. Patricia V. Trumbull
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1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds and Defendant Juniper Networks, Inc. ("Juniper"), by and through their respective
3 attorneys of record.

4 WHEREAS, on November 13, 2009, Lead Plaintiff served its Responses and Objections
5 to Juniper's Fifth Set of Interrogatories (Nos. 16-32) ("Fifth Set of Interrogatories");

6 WHEREAS, the parties met and conferred on November 20, 2009, and Lead Plaintiff
7 agreed to serve amended responses to Juniper's Fifth Set of Interrogatories on or before
8 December 31, 2009;

9 WHEREAS, pursuant to the same meet and confer, the parties agreed that if Juniper
10 believes Lead Plaintiff's amended responses are still deficient, and the parties cannot resolve the
11 dispute through further meet and confers, Juniper may file and serve a motion to compel further
12 responses to its Fifth Set of Interrogatories within ten days from the date on which the parties
13 reach an impasse, but in no event later than January 29, 2010.

14 THEREFORE, the parties stipulate, and request that the Court order, as follows:

15 If the parties have disputes regarding the sufficiency of Lead Plaintiffs' responses to
16 Juniper's Fifth Set of Interrogatories that cannot be resolved through meet and confers, Juniper
17 may file and serve a motion to compel further responses to the Fifth Set of Interrogatories within
18 ten days from the date on which the parties reach an impasses, but in no event later than January
19 29, 2010, and such motion will not be deemed untimely.

20 Respectfully submitted,

21 Dated: December 1, 2009

WILSON SONSINI GOODRICH & ROSATI

22 By: /s/ Joni Ostler
23 Joni Ostler

24 *Counsel for Juniper Networks, Inc.*

1 Dated: December 1, 2009

LOWEY DANNENBERG COHEN & HART, P.C.

2 By: /s/ David Harrison
3 David Harrison

4 *Counsel for Lead Plaintiff*

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6 O R D E R

7 PURSUANT TO STIPULATION, IT IS SO ORDERED.

8 DATED: 12/8/09

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10 PATRICIA V. TRUMBULL
11 United States Magistrate Judge
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